

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of:)	
)	
Revision of the Commission's Rules To)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	

**AMENDMENT TO PETITION FOR LIMITED WAIVER OF
NTELOS INC.**

NTELOS Inc., hereby files this Amendment to our September 21, 2001 Petition for a Limited Waiver of Section 20.18 of the Commission's Rules. The purpose of this Amendment is to allow additional time for the phase-in of our deployment of a network-assisted handset-based solution technology in meeting the Commission's requirements for implementing E911 Phase II service.

This waiver request is submitted by NTELOS Inc. on behalf of its subsidiary NTELOS Wireless Inc. , TRS 807074. NTELOS Wireless Inc. is the managing partner of Virginia PCS Alliance, TRS 816030; Virginia RSA6 Cellular Limited Partnership, TRS 807081; and West Virginia PCS Alliance, TRS 818784.

NTELOS is fully committed to public safety and the Commission's desire for all consumers to have access to E911 services. NTELOS has continued to aggressively roll out our wireless E911 Phase I deployments, which will continue to be the backbone of the E911 Phase II deployment in its market areas. In order to meet the requirements, NTELOS has taken major steps to change or upgrade our network. The Lucent switches in Norfolk, VA and Richmond, VA have been upgraded to the ECP 17.0 software release. The Waynesboro, VA Motorola EMX Switch and the Charleston, WV Lucent switch were both replaced with Nortel MTX switches in May and June 2002 respectively.

On one portion of its implementation plan, NTELOS has encountered a delay that we did not anticipate when we filed our original waiver request in this proceeding on September 21, 2001. NTELOS has selected TCS Xypoint to provide network support for the Assisted GPS Solution on a Service Bureau basis. In our original waiver request,

NTELOS indicated that we planned to complete integration with our service bureau by the end of the 3rd Quarter of 2002. TCS Xypoint has continued to work to provide these services but has recently determined that they cannot provide this service bureau support until sometime in the 4th Quarter 2002.

NTELOS therefore respectfully requests a limited waiver from the Commission's Rules based on the unanticipated delay in integrating the TCS Xypoint Service Bureau support for the Network-Assisted GPS Solution. With the service bureau support being put into place in the 4th Quarter of 2002, NTELOS anticipates that, in 1st Quarter 2003, we will be able to deploy our A-GPS solution in all requested markets.

Respectfully submitted,

NTELOS Inc.

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